

a: jms

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BY ORDER OF THE COURT

CLARE E. CONNORS #7936  
United States Attorney  
District of Hawaii

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

SEP 15 2022

at 12 o'clock and 08 min. P M *an*  
John A. Mannle, Clerk

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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FANGAOKE AHOLELEI,

Defendant.

CR. NO.

**CR 22-00081 JMS**

INDICTMENT

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A),  
and 841(b)(1)(C); 18 U.S.C. §§  
924(c)(1)(A) and 922(g)(1)]

INDICTMENT

The Grand Jury charges:

Count 1

Possession with Intent to Distribute Methamphetamine and Cocaine  
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A) and 841(b)(1)(C))

On or about July 20, 2021, within the District of Hawaii, FANGAOKE AHOLELEI, the defendant, did knowingly and intentionally possess with intent to distribute: (i) 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance; and (ii) a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C).

Count 2

Possession of a Firearm in Furtherance of a Drug Trafficking Crime  
(18 U.S.C. § 924(c)(1)(A)(i))

On or about July 20, 2021, within the District of Hawaii, FANGAOKE AHOLELEI, the defendant, did knowingly possess a firearm, namely a Taurus, model PT 100 AF, .40 S&W caliber handgun bearing serial number SMC22634D, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the drug trafficking crime charged in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

Count 3

Felon in Possession of a Firearm and Ammunition  
(18 U.S.C. §§ 922(g)(1) and 924(a)(1))

On or about July 20, 2021, within the District of Hawaii, FANGAOKE AHOLELEI, the defendant, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime, did knowingly possess: (i) a firearm, namely a Taurus, model PT 100 AF, .40 S&W caliber handgun bearing serial number SMC22634D; and (ii) ammunition, namely ten (10) rounds of .40 caliber ammunition, said firearm and ammunition having been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(1).

FIRST FORFEITURE NOTICE (Drugs)

1. The allegations set forth in Count 1 of this Indictment are hereby re-alleged and incorporated by reference as though set forth in full herein for the purpose of noticing forfeiture pursuant to Title 21, United States Code, Section 853.

2. The United States hereby gives notice that, pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), FANGAOKE AHOLELEI, the

defendant, shall forfeit to the United States of America any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

3. If any of the property described in paragraph 2 above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property up to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p).

#### SECOND FORFEITURE NOTICE (Firearms)

1. The allegations contained in Counts 2 through 3 of this Indictment are incorporated by reference as though set forth in full herein for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).



2. The United States hereby gives notice that, upon conviction of the offenses in violation of Title 18, United States Code, Sections 924(c) or 922(g)(1), as set forth in this Indictment, FANGAOKE AHOLELEI, the defendant, shall forfeit to the United States any firearms and ammunition involved in or used in the commission of those offenses.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 herein:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States of America will be entitled to forfeiture of substitute property up

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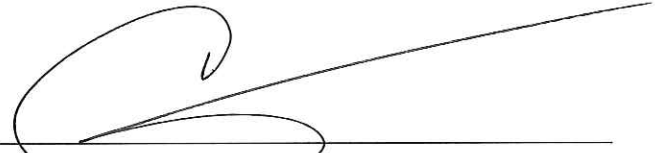
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to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

DATED: SEP 15 2022, at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson  
FOREPERSON, GRAND JURY



CLARE E. CONNORS  
United States Attorney  
District of Hawaii



W. KEAUPUNI AKINA  
Assistant U.S. Attorney

United States v. Fangaoke Aholelei  
Indictment

Cr. No.

**CR 22 - 00081 JMS**